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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	2:16-CV-2067-KJD-(CWH)
	)	
Plaintiff,	)	
	)	
v.	)	United States' Unopposed Motion to
	)	Continue the CAFRA deadline and Order
\$25,000.00 IN UNITED STATES	)	
CURRENCY,	)	
	)	
Defendant.	)	

The United States of America respectfully moves this Court to grant a thirty-day extension of the CAFRA deadline, which, in the above-captioned case, obligates the Government to file its complaint for forfeiture, *in rem*, no later than September 6, 2016. Under the procedural rules of civil forfeiture, codified at 18 U.S.C. § 983, once a putative claimant files an administrative claim with the seizing agency, the United States has ninety days to commence a civil forfeiture action

For its grounds, the United States says that it appears from a preliminary investigation of this matter that this case will be resolved without the need to file a forfeiture complaint *in rem*. The defendant currency in this case was obtained by Barbara Dooley, through her fraudulent representations to Jean Christensen. While Ms. Christensen (the person that the Government

1 believes to be the victim in this case) has filed an administrative claim to the currency, Ms.  
2 Dooley, (the alleged wrong-doer) has not. The Government needs an additional thirty days  
3 beyond the CAFRA deadline of September 6, 2016, in which to investigate whether there are any  
4 other victims who might be entitled to some or all of these seized assets. As noted, the  
5 Government's preliminary assessment is that Ms. Christensen is the sole victim. But the  
6 Government needs the additional time to conduct its due diligence on this matter.

7 On August 26, 2016, undersigned government counsel spoke to Jean Christensen on this  
8 matter on and Ms. Christensen gave Government counsel permission to inform the Court,  
9 through this motion, that she consents to this motion.

10 This motion is not submitted solely for the purpose to delay or for any other improper  
11 purpose.

12 WHEREFORE, the United States moves this Court to grant its motion to extend the time  
13 for the United States to file its complaint in this matter an additional thirty (30) days; or until  
14 October 6, 2016.

15 DATED this 31st day of August, 2016.

16 Respectfully submitted,

17 DANIEL G. BOGDEN  
18 United States Attorney

19 /s/ Michael A. Humphreys  
20 MICHAEL A. HUMPHREYS  
21 Assistant United States Attorney

22 IT IS SO ORDERED:

23   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: September 2, 2016  
26

**CERTIFICATE OF SERVICE**

It is hereby certified that service of the foregoing United States' Unopposed Motion to Continue the CAFRA deadline was made by sending a copy of same by first class mail, addressed to the following addressee, on this 31st day of August, 2016:

Jean Christensen  
8541 35th Avenue  
Kenosha, WI 53142

/s/ Michelle C. Lewis  
MICHELLE C. LEWIS  
Paralegal Specialist